Hearing Date & Time: November 19, 2010 at 5:00 p.m. (ET) Objection Deadline: Objections will be heard at the hearing on November 19, 2010 at 5:00 p.m. (ET)

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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	v	
In re:	:	
	:	
METROPOLITAN 885 THIRD AVENUE	:	Case No. 10-16103 (SCC)
LEASEHOLD, LLC,	:	
	:	Chapter 11 Case
Debtor.	:	
	X	

## AMENDED OMNIBUS NOTICE OF HEARING OF THE DEBTOR'S MOTIONS

**PLEASE TAKE NOTICE** that on November 16, 2010, the above-captioned debtor and debtor in possession (the "**Debtor**") filed the following motions (collectively, the "**Pleadings**"):

- 1. Motion of Metropolitan 885 Third Avenue Leasehold, LLC Pursuant to Sections 361, 362, 363 and 507 of the Bankruptcy Code and Fed. R. Bankr. P. 2002, 4001 and 9014, for Entry of Interim Order: (I) Authorizing the Debtor to Use Cash Collateral; (II) Authorizing Debtor to Provide Adequate Protection Pending Final Hearing; and (III) Scheduling Final Hearing [Docket No. 9];
- 2. Debtor's Motion Pursuant to Sections 105(a), 363(c) and 364(a) of the Bankruptcy Code for Authorization to (I) Continue Using Existing Cash Management System, (II) Maintain Existing Bank Accounts and Business Forms, and (III) Waive Requirements of Section 345(b) of the Bankruptcy Code [Docket No. 10];
- 3. Motion of the Debtor for an Order Authorizing, but Not Directing, the Debtor to Pay Prepetition Claims as They Become Due [Docket No. 11];
- 4. Debtor's Motion Pursuant to Sections 105(a) and 366 of the Bankruptcy Code for an Order (I) Prohibiting Utilities From Altering, Refusing, or Discontinuing

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Service; (II) Deeming Utilities Adequately Assured of Future Payment; and (III) Establishing Procedures for Determining Adequate Assurance of Payment [Docket No. 12].

PLEASE TAKE FURTHER NOTICE that the hearing (the "Hearing") to consider the Pleadings listed above scheduled for November 23, 2010 has been rescheduled to November 19, 2010 at 5:00 p.m. (prevailing Eastern time) and shall be held before the Honorable Shelly C. Chapman, United States Bankruptcy Judge, in Room 610 of the United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that a copy of each of the Pleadings can be viewed on the Court's website at www.ecf.nysb.uscourts.gov and at the website of the Debtor's notice and claims agent, The Garden City Group ("GCG"), at www.gcginc.com/cases/mpl/index.php. Further information may be obtained by calling GCG at 800-327-3664 or by emailing Debtor's counsel at sbudzenski@blankrome.com.

PLEASE TAKE FURTHER NOTICE that any responses to the Pleadings must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on (i) Blank Rome LLP, The Chrysler Building, 405 Lexington Avenue, New York, NY 10174-0208 (Attn: Marc E. Richards, Esq., Joel C. Shapiro, Esq. and

Scott F. Budzenski, Esq.), (ii) the U.S. Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Andrea Schwartz, Esq.), (iii) Fried, Frank, Harris, Shriver & Jacobson LLP, One New York Plaza New York, NY 10004 (Attn: Richard J. Slivinski, Esq. and Janice Mac Avoy, Esq.), (iv) Sullivan & Cromwell LLP, 125 Broad Street New York, NY 10004 (Attn: Pavan C. Surapaneni, Esq. and Benjamin R. Weber, Esq.), (v) Simpson Thacher & Bartlett LLP, 425 Lexington Avenue New York, NY 10017 (Attn: Katherine A. McLendon, Esq. and David L. Williams, Esq.); (vi) the entities listed on the List of Creditors Holding 20 Largest Unsecured Claims Against Debtor filed pursuant to Rule 1007 of the Federal Rules of Bankruptcy Procedure; (vii) the Securities and Exchange Commission; (viii) the United States Attorney for the Southern District of New York; (ix) New York State Department of Taxation and Finance; (x) New York City Department of Finance, Real Property and Transfer Tax Unit; and (xi) on all other parties required to receive service under Rule 2002 of the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York, in each case so as to be received no later than November 19, 2010 by 5:00 p.m. (prevailing Eastern Time) (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Pleadings, the Debtor may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed orders annexed to the Pleadings, which orders may be entered with no further notice or opportunity to be heard offered to any party.

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Dated: New York, NY November 18, 2010 Respectfully submitted,

## BLANK ROME LLP

By: /s/ Marc E. Richards

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-and-

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